

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

FEDO ANTONIA MANNING,

Defendant.

Case No. 24-MJ-00022-WBG

MOTION FOR DETENTION

Comes now the United States of America, by and through its undersigned counsel, and hereby moves this Court to order the detention of defendant Fedo Antonia Manning (“the defendant”), and states the following in support of the motion:

1. This motion is being made at Defendant Fedo Antonia Manning’s first appearance before a judicial officer. This motion for detention is filed by the United States against the defendant in this case. The Criminal Complaint contains the following charges: conspiracy to traffic firearms; engaging in firearms sales without a license; and making false statements on ATF Form 4473.

2. Based on this charges and the present motion, this Court “shall hold a hearing to determine whether any condition or combination of conditions . . . will reasonably assure the appearance of such person as required and the safety of any other person and the community.” 18 U.S.C. § 3142(f).

3. Under the Bail Reform Act, a defendant can be detained before if “the government shows by clear and convincing evidence that no release condition or set of conditions will reasonably assure the safety of the community and by a preponderance of the evidence that no

condition or set of conditions . . . will reasonably assure the defendant's appearance can a defendant be detained before trial." *United States v. Kisling*, 334 F.3d 734, 735 (8th Cir. 2003) (quoting *United States v. Orta*, 760 F.2d 887, 891 & n.20 (8th Cir. 1985) (en banc)).

4. In determining whether pretrial detention is appropriate, the Court shall consider information concerning the nature and circumstance of the offense, the weight of the evidence against the defendant, the defendant's history and characteristics, and the danger to any person of community posed by the defendant's release. 18 U.S.C. § 3142(g).

5. Based on the the Affidavit of Special Agent Steven Lester of the Bureau of Alcohol, Tobacco, Firearms and Explosives, the defendant has purchased a substantial amount of firearms during a short period of time and many of these firearms have been sold to a prohibited CI who had a prior felony conviction or they have been utilized in various crimes.

6. The United States submits that there are no conditions which the Court could place on the defendant's release which would reasonably assure the safety of the community by clear and convincing evidence and reasonably assure the defendant's appearance by a preponderance of the evidence.

WHEREFORE, based on the foregoing, the United States requests that the Court hold a Detention Hearing in accordance with 18 U.S.C. § 3142(f), and following such hearing, order the detention of the defendant.

Respectfully submitted,

Teresa A. Moore
United States Attorney

By /s/William A. Alford III

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on March 13, 2024, to the CM-ECF system of the United States District Court for the Western District of Missouri, and a copy of the foregoing will be hand-delivered to the defendant at his first appearance before a judicial officer.

/s/William A. Alford III

William A. Alford III
Assistant United States Attorney